

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LARRY E. KLAYMAN, CHARLES
STRANGE, and MARY ANNE STRANGE,
on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

BARACK HUSSEIN OBAMA,
ERIC HIMPTON HOLDER, JR.,
KEITH B. ALEXANDER, LOWELL C.
MCADAM, ROGER VINSON,
VERIZON COMMUNICATIONS,
NATIONAL SECURITY AGENCY, and
U.S. DEPARTMENT OF JUSTICE,

Defendants.

No. 1:13-cv-00851-RJL

Dockets.Justia.com

**DECLARATION OF JANE A. SCHAPKER IN SUPPORT OF THE VERIZON
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS AMENDED COMPLAINT**

I, JANE A. SCHAPKER, declare as follows:

1. I am the Assistant Corporate Secretary for Verizon Communications Inc. and Executive Director of Corporate Governance. I make this declaration in support of the motion to dismiss filed by the Verizon Defendants. The facts stated herein are based upon my own personal knowledge, informed by a review of corporate records of Verizon Communications Inc. and interviews with knowledgeable persons. If called to testify, I could and would testify competently to the facts set forth below.

2. Verizon Communications Inc. is a Delaware corporation with its principal place of business located at 140 West Street, New York, New York.

3. Verizon Communications Inc. is a holding company whose sole purpose is to hold stock of other companies. Verizon Communications Inc. is separate and distinct from other Verizon entities and maintains all corporate formalities.

4. Verizon Communications Inc. does not sell, market, or provide any telecommunications services. Verizon Communications Inc. is not now, nor has ever been, qualified or licensed to do business in the District Columbia. It does not have a registered agent for service of process in the District of Columbia.

5. Verizon Communications Inc. does not have offices in the District of Columbia, does not own or lease any real property in the District of Columbia, and does not advertise, solicit, or conduct business in the District of Columbia.

6. The Summons for Verizon Communications Inc. in this case was received by certified mail on September 30, 2013, at Verizon Communications Inc.'s offices at 140 West Street, New York, New York. Plaintiffs otherwise did not attempt to serve the complaint on Verizon Communications Inc.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 20, 2013.



JANE A. SCHAPKER